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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Omri Ben Abu and Raeanna Jackson,

Plaintiffs,

v.

Chad Wolf, Acting Secretary of Department
of Homeland Security; Kenneth T. "Ken"
Cuccinelli II, Acting Director, U.S.
Citizenship and Immigration Services; Katy
K. Leung, Field Office Director, Las Vegas
Field Office U.S. Citizenship and
Immigration Services;

Defendants.

Case No. 2:21-cv-00156-GMN-NJK

**Stipulation to Extend the United States'
Deadline to Answer**

(Third Request)

Plaintiffs Omri Ben Abu and Raeanna Jackson and the United States of America,
on behalf of Federal Defendants Chad Wolf, Kenneth T. Cuccinelli II, and Katy K. Leung,
through counsel, hereby stipulate and agree as follows:

1. Plaintiffs filed their Complaint for Injunctive and Mandamus Relief on his
Complaint on May 6, 2021.

2. Plaintiffs served the United States with a copy of the Summons and
Complaint on October 27, 2021.

3. The deadline for Federal Defendants to answer or otherwise respond was
December 27, 2021.

1 4. On December 28, 2021, the Court granted Federal Defendants' motion to
2 extend the deadline for the United States to answer or otherwise plead to January 10, 2022
3 (ECF No. 11).

4 5. On January 10, 2022, the parties stipulated to another 30-day extension
5 (ECF No. 12).

6 6. The Court granted the parties' second stipulation to extend and provided the
7 United States until February 9, 2022, to answer or otherwise plead (ECF No. 13)

8 7. Since the Court granted the parties' previous extensions, the parties have
9 continued to engage in good faith discussions to resolve this case without further Court
10 intervention. These discussions have been delayed due to Plaintiffs' relocation to
11 Maryland. However, the parties have agreed that the United States shall have 30 additional
12 days to file an answer or other responsive pleading on behalf of Federal Defendants to
13 allow ongoing discussions to continue.

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Therefore, the parties request that the Court extend the deadline for the United States

 to answer or otherwise respond by March 11, 2022.

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Skyler H. Pearson
SKYLER H. PEARSON
 Assistant United States Attorney
Attorneys for the United States

DATED: February 9, 2022